**Our Case Number:** ABP-321937-25

An Bord Pleanála

National Transport Authority
Haymarket House
Smithfield
Dublin 7
D07 CF98

**Date:** 23 April 2025

**Re:** This proposed development is for flood defences at key locations along the Carrickmines and Shanganagh rivers including new walls/raised existing walls, culverts, localised screens upgrades and localised works in the river. An Environmental Impact Assessment Report (EIAR) is submitted with application
This proposed Flood Relief Scheme for the Carrickmines-Shanganagh Rivers at sites in the townlands of Woodside, Kilgobbin, Carrickmines, Brennanstown, Shankill, Loughlinstown, Shanganagh and Hackettsland

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it or approved it with conditions.

If you have any queries in relation to the matter please do not hesitate to contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Aisling Reilly
Executive Officer
Direct Line: 01-8737131

JA03


| | | |
|---|---|---|
| **Teil** | **Tel** | (01) 858 8100 |
| **Glao Áitiúil** | **LoCall** | 1800 275 175 |
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64 Sráid Maoilbhríde
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64 Marlborough Street
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## Aisling Reilly

**From:** LAPS
**Sent:** Tuesday 15 April 2025 17:58
**To:** Aisling Reilly
**Subject:** FW: NTA submission - JA06D.321937 – Flood Relief Scheme for the Carrickmines and Shanganagh Rivers
**Attachments:** NTA-Submission_JA06D.321937_Shanganagh-Flood-Relief-EIAR_SID_FINAL.pdf

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**From:** Robert Parkinson <Robert.Parkinson@nationaltransport.ie>
**Sent:** Tuesday 15 April 2025 16:23
**To:** LAPS <laps@pleanala.ie>
**Subject:** NTA submission - JA06D.321937 – Flood Relief Scheme for the Carrickmines and Shanganagh Rivers

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Dear Sir/Madam,

Please find attached a submission from the National Transport Authority on SID Case No. **JA06D.321937 – Flood Relief Scheme for the Carrickmines and Shanganagh Rivers.**

I would be grateful for confirmation of receipt of this submission.

Regards,

Robert Parkinson.

NTA
Údarás Náisiúnta Iompair
National Transport Authority

**Robert Parkinson**
Land Use & Transport Planner
Údarás Náisiúnta Iompair | National Transport Authority
Teach Mhargadh an Fhéir, Margadh na Feirme, Baile Átha Cliath 7, D07 CF58
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robert.parkinson@nationaltransport.ie
www.nationaltransport.ie

I gcomhréir leis an mbeartas maidir leis an gCeart chun Dícheangail de chuid an UNI, má tá an ríomhphost seo á fháil agat taobh amuigh de ghnáthuaireanta oibre, nílim ag súil le freagra ná gníomh uait taobh amuigh de d'uaireanta oibre féin.
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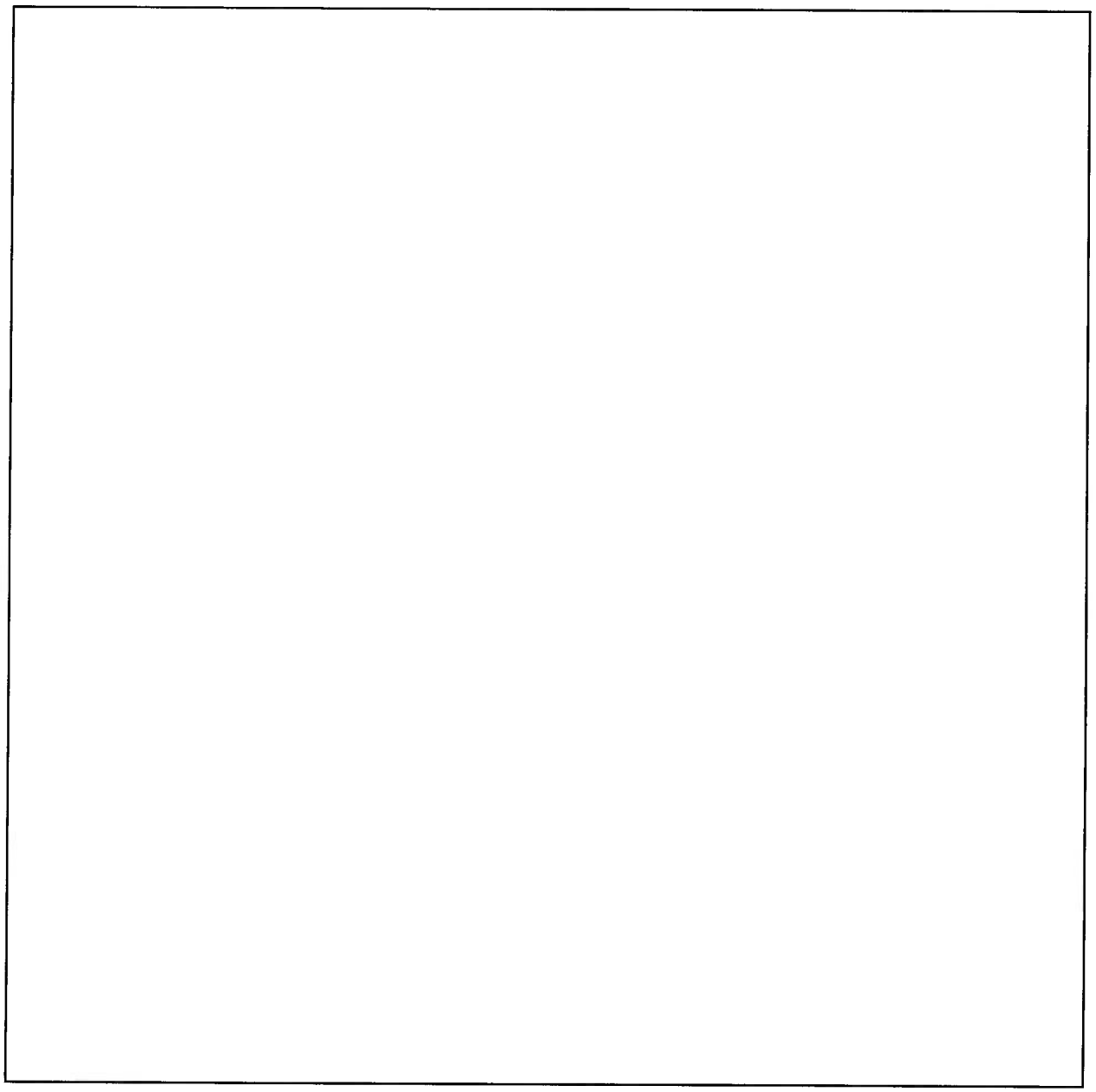

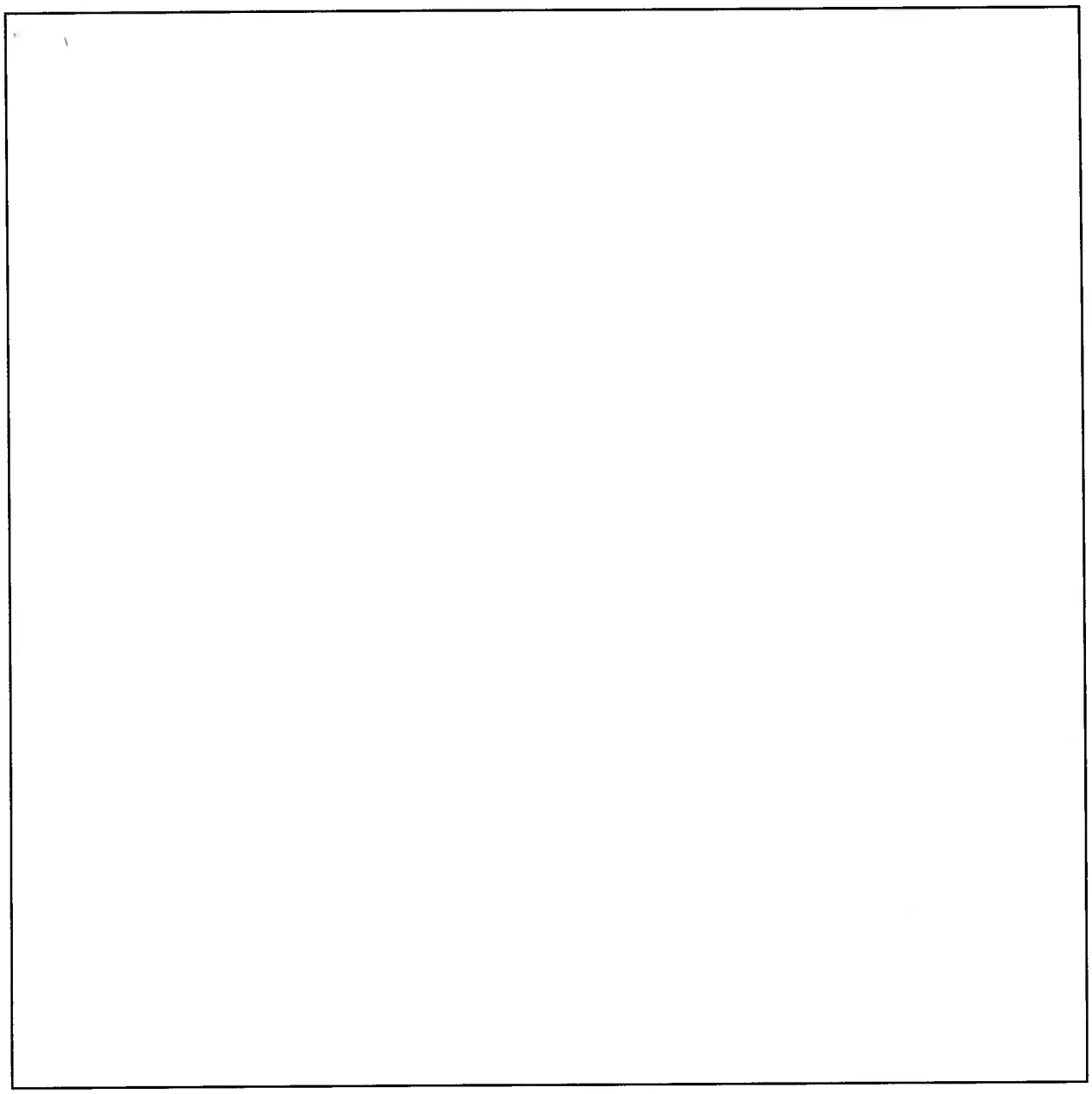

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

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Strategic Infrastructure Section,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.

15th April 2025

By e-mail: laps@pleanala.ie

**Re: Reg. Ref. JA06D.321937 – Flood Relief Scheme for the Carrickmines and Shanganagh Rivers**

Dear Sir/Madam,

The National Transport Authority ('the NTA') has reviewed the *Environmental Impact Assessment Report* (EIAR) and associated documents related to the Carrickmines and Shanganagh Flood Relief Scheme. On the basis of the *Greater Dublin Area Transport Strategy 2022-2042* ('the Transport Strategy'), the NTA wishes to submit the following observations and recommendations for the consideration of An Bord Pleanála.

**EIAR Scoping**

The NTA was consulted by the project team during the Scoping stage of the EIAR preparation. In its submission, the NTA highlighted the critical need to maintain access for sustainable transport modes through the discrete works areas during the construction phases. This would be particularly important at the proposed N11 site, which carries national and regional bus and coach services, buses in the Dublin area service network, cyclists and pedestrians, as well as emergency vehicles and general vehicular traffic.

**EIAR: Material Assets – Traffic and Transport**

Chapter 11 of the EIAR sets out the proposals for each works area as they relate to all modes of transport. The NTA acknowledges the consideration given to sustainable transport in the EIAR and the general intention to maintain existing alignments for buses and active travel in the areas where these modes would interact with the works areas. On routes carrying buses and/or HGVs, a minimum lane width of 3.0 metres would be maintained, while on other traffic routes the lanes would be a minimum of 2.5 metres, albeit that such locations would be controlled by traffic signals or a Stop/Go shuttle system, which would reduce the two-way vehicular throughput. The hours of operation of the traffic management works at each location would also seem to have taken account of the function of each link, with work proposed outside the morning and evening peak hours on higher capacity routes and on routes that would carry buses. In the case of the N11, works are proposed only at night between 8:00 pm and 5:00 am, with daytime working subject to the agreement of relevant authorities.

In certain cases, it is proposed to close footpaths and/or cycle tracks temporarily, e.g. at Kilgobbin Road, Glenamuck Road North and Commons Road. It is not clear how pedestrian and cyclist movements would be provided for in these locations, i.e. whether dedicated crossing locations would be identified for such users to access facilities on the opposite side of the road, or if they would be required to use the vehicular carriageway either with or without the benefit of protected or segregated facilities. At both Glenamuck Road North and the N11, the NTA notes the proposal that cyclists would be required to dismount and to proceed through the works areas on the temporary footways, which would be a minimum of 1.8 metres wide.

As noted, the N11 is the most sensitive site from a transport perspective. In light of its critical role in the local and regional transport networks, the EIAR proposes a package of measures including temporary closure of lanes / footpaths / cycle tracks, re-configuration of traffic lanes and provision of a temporary footway with a minimum width of 1.8m to maintain pedestrian / cyclist movements (cyclists on foot). It is also proposed that works would only take place during nighttime hours (20:00-05:00) and that the 'temporary closure of traffic lanes at N11 and Bray Road [would] re-open for public use outside the working hours' (EIAR, p.291). However, it is not clear whether the full complement of traffic lanes and active travel facilities would be available outside the proposed working hours.

Glenamuck Road North provides access to the Carrickmines Park & Ride facility adjacent to the Carrickmines Luas stop. This is a critical piece of infrastructure in the light rail network and access to the facility should be maintained at all times, with priority given to vehicles approaching from the M50 due to the potential for tailback onto the motorway.

Recommendations:

The NTA recommends that continuous facilities for pedestrians and cyclists should be provided through all works areas, and that requiring cyclists to dismount should be the option of last resort. Where pedestrians and cyclists are required to cross a road to proceed, a dedicated crossing point should be provided that would cater for all users in accordance with the principles of Universal Design. The NTA also recommends that, to the greatest extent possible, the N11 should be made usable outside working hours by reopening the temporarily closed lanes. Regarding access to the Carrickmines Park & Ride, the NTA recommends that access to and egress from this facility in all directions should be maintained throughout the proposed works period, with priority given to traffic coming from the M50.

**Construction Traffic Management Plan**

While Chapter 11 of the EIAR sets out a range of proposals to facilitate sustainable transport modes in the works areas and their environs, the NTA notes that a Construction Traffic Management Plan (CTMP) is proposed to be prepared following receipt of consent for the scheme. It is apparent that the proposed CTMP will be a key document in the provision for, and management of, all modes of transport during the construction phases on the proposed scheme. The EIAR states that the CTMP would be prepared in full consultation with DLRCC, An Garda Síochána, the Fire Service and the Ambulance service and would be agreed with and approved by DLRCC Transportation Department in advance of implementation (Section 11.5.1, EIAR). In light of the importance of maintaining existing levels of service for sustainable transport during the construction phase of the proposed scheme, the NTA requests the opportunity to contribute to the CEMP, through liaison with DLRCC as the roads authority for the subject areas.

Recommendation:

The NTA recommends that the proposed Construction Traffic Management Plan would benefit from the input of the NTA, in addition to the list of proposed stakeholders, in order to minimise disruption to sustainable transport modes during the construction of the flood relief works.

I trust that the views of the NTA will be taken into consideration in the assessment of the proposed scheme.

Yours sincerely,

Michael MacAree

**Michael MacAree**
**Head of Strategic Planning**